

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN  
DISASTER SITE LITIGATION

**21 MC102 (AKH)**

NOTICE TO PRODUCE DOCUMENTS  
PURSUANT TO FEDERAL RULE OF  
CIVIL PROCEDURE 34

To: Centry 21 Departmenet Store, LLC and Blue Millenium LLC  
c/o Stanley Goos, Esq.  
Harris Beach  
100 Wall Street  
New York, NY 10005  
sgoos@harrisbeach.com

**PLEASE TAKE NOTICE**, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 22/26 Cortland Street, as referenced in the deposition of John Feehan, on May 8<sup>th</sup>, 2012, at or about page as referenced below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

1. Emergency crisis plan in exisistence in September 11<sup>th</sup>, 2001 and/or an updated emergency crisis plan indicating the update date or the revision date. As requested on or about page 53 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation.

Dated: New York, New York  
February 27, 2013

GREGORY J. CANNATA & ASSOCIATES  
Plaintiffs- Liaison Counsel

By: \_\_\_\_\_

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